

**LAW OFFICES OF DALE K. GALIPO**

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

DOROTHEY HEIMBACH,  
individually and as successor in  
interest to Anthony Silva,

Plaintiff,

vs.

STANISLAUS COUNTY; and  
JUSTIN CAMARA, ZA XIONG, and  
ERIC BAVARO, in their individual  
capacities,

Defendants.

**Case No. 2:23-CV-01887-DJC-CSK**

Judge: Hon. Daniel J. Calabretta

Magistrate Judge: Chi Soo Kim

**JOINT REQUEST TO APPEAR  
REMOTELY AT THE NOVEMBER  
6, 2025, FINAL PRETRIAL  
CONFERENCE HEARING**

**[Filed concurrently with [Proposed]  
Order]**

Date: November 6, 2025

Time: 1:30 p.m.

Dept.: 10

**TO THE ABOVE –ENTITLED COURT AND TO ALL PARTIES AND  
THEIR ATTORNEYS OF RECORD:**

Counsel for Plaintiff and Defendants’ hereby respectfully request that attorneys be allowed to appear by Zoom or telephonically (or other remote web conference platform) at the Final Pretrial Conference hearing currently scheduled for November 6, 2025, at 1:30 p.m.

1 Due to several scheduling conflicts, the parties will be unable to attend the  
2 hearing in person.

3 Although the Court disfavors remote appearances, good cause exists here.  
4 Plaintiff's lead counsel, Mr. Galipo, will be in the midst of trial preparation for a  
5 jury trial set to begin on November 10, 2025, *Quair v. County of Kings*, 1:20-cv-  
6 01793-KJM-SKO (Judge Kimberly J. Mueller). An in-person hearing would  
7 require Mr. Galipo to travel from Los Angeles to Sacramento—a trip that would  
8 consume most of the day. The additional burden of devoting a full day to travel,  
9 rather than trial preparation, would significantly impair counsel's ability to prepare  
10 adequately and efficiently for trial.

11 Accordingly, Plaintiffs respectfully request that the Court exercise its  
12 discretion to permit Mr. Galipo to appear remotely at the final pre-trial conference.  
13 Insofar as Plaintiff's counsel are seeking to appear remotely, the same should be  
14 allowed for counsel for Defendants

15 DATED: September 26, 2025 **LAW OFFICES OF DALE K. GALIPO**

17 By: /s/Cooper Alison-Mayne  
18 Dale K. Galipo  
19 Cooper Alison-Mayne  
20 *Attorneys for Plaintiffs*

22 DATED: September 26, 2025 **PORTER SCOTT**

24 By: /s/ John Whitefleet  
25 John Whitefleet  
26 *Attorney for Defendants*